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Submitted via E-mail

June 9, 2017

Ms. Esther Barajas-Ochoa
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RE: Comments on Proposed No Significant Risk Level for Glyphosate

Dear Ms. Barajas-Ochoa:

These comments are submitted on behalf of Safe Ag Safe Schools (Monterey Bay), Non-Toxic Santa Cruz, Non-Toxic Pacific Grove, Project Pollinate (Santa Cruz), and the Monterey Bay Central Labor Council (collectively "organizations"). Our organizations, representing tens of thousands of Monterey and Santa Cruz County residents, are deeply committed to protecting environmental and community health. We support the Office of Environmental Health Hazard Assessment (OEHHA)'s proposal to adopt a No Significant Risk Level (NSRL) for exposure to glyphosate under the Safe Drinking Water and Toxic Enforcement Act of 1986 ("Prop 65").

However, the proposed 1100 micrograms per day NSRL for glyphosate is not based on the most sensitive study of acceptable quality. We therefore request that OEHHA revise the NSRL to be based off a dose of 31.49 mg/kg/day, the level indicated by the best available science.

Included in the glyphosate analysis of the Environmental Protection Agency's Cancer Assessment Review Committee[1] are three high quality studies demonstrating that exposure to glyphosate below 1000 mg/kg-day leads to a statistically significant increase in the development of certain cancers. Wood et al. (2009) found a statistically significant increase in malignant lymphoma at 810 mg/kg/day.[2] Stout and Ruecker (1990) found a statistically

[1] EPA. Office of Pesticides Programs. Glyphosate Issue Paper: Evaluation of Carcinogenic Potential. September 12, 2016. Available at: https://www.epa.gov/sites/production/files/2016-09/documents/glyphosate_issue_paper_evaluation_of_carcincogenic_potential.pdf.
[2] Wood, E., Dunster, J., Watson, P., and Brooks, P. (2009b) Glyphosate Technical: Dietary Carcinogenicity Study in the Mouse. Harlan Laboratories Limited, Shardlow Business Park, Shardlow, Derbyshire DE72 2GD, UK. Study No. 2060-

significant increase in pancreatic islet cell adenomas in male rats at 89 mg/kg/day and at 940 mg/kg/day.[3] The Lankas et al. study (1981) found a statistically significant increase in testicular interstitial tumors in male rats at 31.49 mg/kg/day.[4]

The State of California has taken an important step in listing glyphosate as a known human carcinogen, but the listing is only as effective as the NSRL will allow. We must ensure that people will not potentially be exposed to levels of glyphosate that can cause them harm. Our organizations strongly urge OEHHA to base the glyphosate NSRL off of a value of 31.49 mg/kg/day, the level based on the most sensitive study.

Sincerely,

Carole Erickson, RN, PHN

Carole Erickson, RN and Francisco Rodriguez
Co-Chairs, Safe Ag Safe Schools

Cesar Lara
Executive Director, Monterey Bay Central Labor Council

Eleyah Knight

Eleyah Knight
President, Non-Toxic Santa Cruz

Drew Glover
Executive Director, Project Pollinate

Karin Locke

Karin Locke and Cathy Wooten
Co-Chairs, Non-Toxic Pacific Grove

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011. April, 22, 2009. MRID 49957402. Also referred to as Nufarm. (2009a). Glyphosate Technical: Dietary Carcinogenicity Study in the Mouse. Derbyshire, UK: Harlan Laboratories Ltd. in Greim et al.

[3] Stout, L. D. and Ruecker, P.A. (1990). Chronic Study of Glyphosate Administered in Feed to Albino Rats. MRID No. 41643801; Historical Controls. MRID 41728700.

[4] Lankas, G, P. (1981) A Lifetime Study of Glyphosate in Rats. Report No. 77-2062 prepared by Bio Dynamics, Inc. EPA Accession. No. 247617 – 247621. December 23, 1981. MRID 00093879. Also referred to as Monsanto. (1981). A Lifetime Feeding Study of Glyphosate (ROUNDUP Technical) in Rats. East Millstone, New Jersey, USA: Bio/dynamics Inc in Greim et al.